

## Supplanting Criteria

The March 28, 2000 Order of the Commissioner of Insurance requires that the AHW Funds (the Funds) “may not be used to supplant funds or resources that are available from other sources.” The MCW Consortium is required to report annually on “whether the Funds are supplanting resources otherwise available.” MCW must report annually the basis for the “determination that the application of the Funds does not supplant other resources that may be available to accomplish the same purposes.”

**Supplant means to replace. The concern over supplanting focuses on replacing existing funding with AHW Funds for specific projects or uses.**

To ensure compliance with the Order not to supplant, the following set of criteria will be used to identify existing or available funding for each proposed project or use and to determine whether such existing or available funding would be replaced with financial support by the Funds.

Prior to recommending funding for community-MCW partnership projects, the MCW Consortium will assess whether other financial resources exist or are available for the project, including an assessment of whether the community partner has other financial resources available for the project. Partners must certify that no financial resources will be supplanted and provide a complete listing of current funding sources for the project, or similar current or prior projects, so that an accurate assessment of supplanting versus leveraging can be made.

The following criteria will be considered to determine whether financial support by the Funds for a proposed project or proposed use would supplant other available financial resources:

- 1. Closely related projects or uses and financial resources for related projects or uses** - A related project or use includes (i) a project or use with a similar or related purpose conducted by MCW or within the community and (ii) all projects, research activities and education activities conducted by the faculty member and/or community partner within the three year period immediately prior to the application or submission. All related projects and uses and financial resources for such related projects and uses should be identified and considered.
- 2. Sources of financial resources for the project or use** - Financial support provided by a governmental source for a project or use within the three year period prior to the date of the application or submittal should be identified. Financial support provided by a source other than a governmental source and other than the Funds for a project or use within the two year period prior to the date of the application or submission should be identified.
- 3. Availability of Federal funding** - Consideration should be made whether Federal funding is available, including grants awarded for the project or use, announced available funding for the project or use and eligibility to apply for available funding.
- 4. Availability of State funding** - Consideration should be made whether State funding is available. Consideration should be made with respect to programs for which state funding has been or may be reduced due to budget cut-backs. Consideration should be made with respect to governmental mandated programs without governmental funding.
- 5. Availability of College corporate funding** - College corporate funds are derived from tuition, the academic enrichment fund assessment on clinical revenue, facilities and administrative fees paid under federal grants, investment income on working capital and unrestricted philanthropy. Consideration should be made whether College corporate funds are available. Expenditures of College corporate funds for a project or use during the two year period immediately prior to the application or submission for financial support by the Funds should be identified.

- 6. Availability of community funding** - Sources of community funds will be determined on a case by case basis. Consideration should be made whether community funds are available. Community financial support for a project or use provided during the two year period immediately prior to the application or submission for financial support by the Funds should be identified.
- 7. Availability of matching funds; opportunities for leveraging** - Supplemental uses and limited term funding will be factors in the consideration process. Matching funding and opportunities to leverage the Funds to obtain other funding are to be encouraged.
- 8. Other factors applicable to the specific proposed project or use** - Either the Dean and Executive Vice President, the Senior Vice President for Finance and Administration or the MCW Consortium may identify other factors to be considered.